

881 HILLSIDE RESTORATION PHASE 1-B
PROJECT MANAGEMENT PLAN,
WORK PROCEDURES, *
QUALITY ASSURANCE PROJECT PLAN, AND
SITE SPECIFIC HEALTH AND SAFETY PLAN
FOR CONSTRUCTION

AUGUST 1990

PROJECT MANAGEMENT PLAN

General: A site map showing the location of the SWMU and construction is necessary.

Section 2.0 Project Milestones: A milestone for briefing DOE/RFO is not included.

Section 3.1 Project Management: Is UNC Geotech the construction subcontractor? The health and safety plans to be followed must be identified. All control documents used for Phase 1B must be identified. The Project Manager shall have soil moisture testing done to ensure prevention of dust resuspension during activities of soil disturbance.

Section 3.3 Construction: The Project Manager has stop work order authority. Stop work authority delegated to other personnel on the project could cause confusion. All stop work orders must go through the project manager.

Section 3.4 Health and Safety: A draft Health and Safety plan was submitted to and reviewed by EPA in September, 1990. This section needs to reference that plan and be amended according to EPA comments submitted. Is the Response Action Contractor the construction contractor? The Response Action Contractor must follow the Environmental Restoration approved Health and Safety Plan. The current draft health and safety plan does not refer to the Response Action Contractor Q/A Project Plan and Health and Safety Plan. The Health and Safety Coordinator must work through the Project Manager in regard to stop work orders.

Section 6.0 Project Reports: The reporting requirements must be identified. The frequency of reporting must also be identified.

Section 7.0 Project Change Control: The change orders must be approved by the Project Manager.

CONSTRUCTION WORK PROCEDURES

General: The copying was of very poor quality and difficult to read.

Prerequisites:

2. All soil in the construction area and vehicle pathway must meet soil moisture content criteria. The document currently reads contaminated soils. This is not adequate as the contamination has not been fully characterized.

4. UNC hi-vols must be calibrated before use.

Required Materials for Construction: Air samplers.

Required Documents for Construction: This list must include the documents identified in Section 9.0 of the Project Management Plan.

QUALITY ASSURANCE PROJECT PLAN

Section 4.1 Responsibilities of key participants: The 881 Phase 1B Health and Safety plan must be consistent with the Environmental Restoration Health and Safety Plan.

The construction coordinator must work through the Project Manager regarding stop work authority. The Health and Safety Plan identified in the Health and Safety Site Coordinator section must be identified. The Health and Safety Coordinator must work through the Project Manager regarding stop work orders. The Air Programs Representative is also responsible for low-volume air samplers. The Quality Assurance Officer must work through the Project Manager regarding stop work orders.

Criterion, 8, Identification and Control of Items and Samples: Explain the omission of field measurement and observation records from this section (refer to phase IA). It is not clear who the Response Action Contractor is and his/her relationship to the QA officer.

Criterion 10, Inspection and Surveillances: A list of EG&G's testing services should be provided.

Criterion 11, Test Control: A list of testing to take place must be provided.

Criterion 12, Control of Measuring and Test Equipment: The person/position in EMAD responsible for verifying calibration of equipment must be identified. The records in which the verification data will be entered must be identified.

Criterion 17, Records: The noncompliance reports must also be kept with the QA Records file.

UNC GEOTECH HEALTH AND SAFETY PLAN

General: EPA comments submitted on September 13, 1990 regarding the Rocky Flats Plant Draft Site Health and Safety Program Plan must be referenced and incorporated into the UNC Geotech H&S plan where possible.

1.2 Project Duration: The schedules in the IAG show that Phase IB is 130 days beginning in October 1990 and ending in March, 1991. This is not in agreement with this document.

1.4 Scope of Work: The IM/IRA also includes pumping of collected groundwater to the treatment building.

1.5 Hazard Assessment Overview: The toxic chemical levels abbreviations must be defined as this document must be available for review by all personnel working at the site. Other possible hazards are electrical and exposure.

1.7 Reference Manuals: The complete title of the reference material must be furnished.

3.0 Assignment of Responsibilities/Key Personnel: This section must correspond to the descriptions in the Project Management Plan.

3.2.2 Operational Health and Safety Supervisor: This section does not correspond 1 to 1 with the Health and Safety Section in the QAPjP, p. 9 (i.e. no mention of OHSTs). A health and safety organizational chart would be helpful in tracking who is responsible for what and to whom. Stop work orders must be carried out through the Project Manager. The project manager or backup must be available at all times.

3.4.2 EG&G Personnel: Backups must also be identified.

4.1 Task Identification: The dates are not those listed in the IAG schedules.

4.2.2 Chemical Hazards Indirectly Related to Work: The chemical information from SWMU 177 must be in this document prior to finalization of this document. Workers need to be aware of contaminants in the area of work. Additionally, the wastes stored in the decontamination pad must also be mentioned.

4.3 Biological Hazards: Any process wastes that are found in the area must be noted and reported to EPA and CDH immediately. Workers must be briefed on the types of wastes that potentially could be in the sewer line and ways of identifying the wastes. The Occupational Radiation Workers guidelines must be presented. The training and monitoring requirements of DOE Order 5480.11 Radiation Protection for Occupational Workers must be provided. The estimate of the potential worker annual effective dose equivalent (AEDE) and committed dose equivalent (CEDE) from all intakes and sources must be provided. It appears that a part of this section is missing in this document.

4.5 Physical Hazard Identification: The page number and or name of the tasks must be included to easily reference the task. The Job Safety Analysis criteria must be identified in the safety plan. The SHSC's duties must reference the JSA. The JSAs identified as necessary were not attached. A location for the JSAs must be provided.

Omnipresent Hazards: Hypothermia could be a hazard.

Task 2.1-2.4: Exterior Utilities - What does CO stand for? Installation of the sewer system may also expose workers to inadvertently disposed of process waste.

5.1 Training: The workers must also take the RCRA/CHWA training computer training course. The training records must include the 40 hr. OSHA training certification.

5.2 Specifications of Individual Training Requirements: Worker job descriptions must be in place prior to the start up of work.

6.1 Selection of Ensembles and Equipment: The detection limits for organic vapors or explosive gases must be provided.

Routes of Exposure: The legs and arms can be exposed. Tyvex-type suits can prevent exposure.

Engineering Controls: If any hazardous wastes are encountered, then regulatory controls would come into play.

7.1 Required Information: A sample Geotech Form 1733 must be included. Will the forms listed include all the medical information required by 29 CFR 1910.120 and DOE Order 5480.8? The information required by these requirements must be listed. The type of dosimetry used by each worker must be provided. The methods or plan used to provide medical monitoring must be provided. The Medical Surveillance Information Sheet does not track daily exposure of workers. Refer to EPA comments under section 5.0, page 5-1 of the Draft Health and Safety Plan.

8.1 Site Monitoring:

8.1.1, 8.1.3 and 8.1.4: - The ER person in charge of monitoring and calibrating the air monitors must have a copy or easy access to all manuals listed in this section.

8.1.2: - The type of instrumentation used to monitor radiation must be stated. Calibration and the instruments and records of surveys must be kept.

8.2 Site Air Monitoring Program: A map showing the location of the air monitors is necessary.

9.1 Site Map: The map must also include the project manager's office.

9.4 - Safe work practices: The manuals listed must be located in the project manager's office for reference by the workers.

10.1 Equipment Decontamination: The manuals listed must be located in the project manager's office for reference by the workers. Disposal of any hazardous or mixed wastes or potential hazardous or mixed wastes must follow procedures established under RCRA and the Colorado Hazardous Waste Act.

10.2 Selection of Step-off Decontamination Sequence: A copy of the HSPP must be available in the project manager's office for worker review.

10.3 Personnel Decontamination: The manuals mentioned must be available in the project manager's office for worker review.

11.1 Emergency contacts and phone numbers: The emergency contact numbers must be posted in the project manager's office also. A map showing the evacuation routes to medical treatment must be included.

11.4 Notification and reporting: The person listed on page 37 of the HASP must also be listed here. Geotech Manual 102 must be available in the project manager's office.

11.5 Equipment: The locations in this section must be determined and identified in the document.

Appendix A-1: The meteorologic data is illegible.

Appendix A-2: The topographic map is illegible. The Geotech Rocky Flats Program Health and Safety Plan is not included..